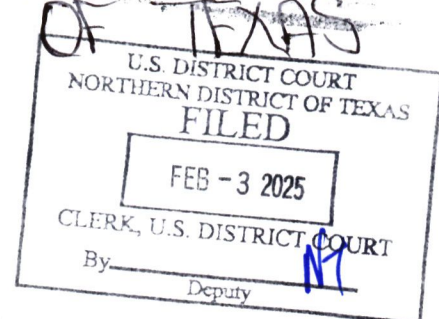


IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS

Thomas C. Sosa Jr.
Petitioner



VS

No. 3:22-CV-2078-K-BN

State Of Texas ET AL
Respondent

MOTION LEAVE TO AMEND OR
SUPPLEMENT FOR EVIDENTIARY
HEARING

Comes Now Petitioner Sosa's sole purpose for this proceeding. Seeks an evidentiary hearing to develop a factual record towards the district court in support of 6th Amendment violation. That if the facts are fully developed, be able to demonstrate court-appointed counsel's refusal/failure to insure that Petitioner is not imprisoned in violation of the Sixth Amendment. See United States v Gernier, 65 F.4th 777 (April 19, 2023). Where as true, evidentiary hearing

would prove that his counsel performed deficiently for the denial to have adjudicated potentially exonerated evidence: 7-Eleven surveillance video tapes maintained within the Dallas District Attorney's office. That Petitioner was prejudiced by counsel's deficient performance which clearly proves making it impossible for Petitioner to have committed Aggravated Robbery. Petitioner is confined illegally and is therefore entitled to relief. See Hernandez v United States, 778 F.3d 1230 (March 2, 2015); Amaury Villa v United States, 56 F.4th 417 (Jan. 3, 2023).

CONCLUSION

Wherefore, Premises Considered, Petitioner prays that Court vacate and REMAND with instruction to conduct an evidentiary hearing to determine whether Petitioner is entitled to relief. Executed came the 27th day of JANUARY, 2025.

Respectfully Submitted,
Mr. Thomas C. Sosa Jr.

Mr. Thomas C. Sosa Jr.

2374326

Polonsky Unit

3872 FM 350 South

Livingston, Texas 77351

January 27, 2025

Clerk
U.S. District Court
1100 Commerce • Rm. # 1452
Dallas, Texas 75242-1495

Re: (1). No. 3:22-CV-2078-K-BN
(2). Motion Leave To Amend Or Supplement
For Evidentiary Hearing

Enclosed, find the following above and please file,
such within this Honourable Court as soon as possible!

Respectfully Submitted,
Mr. Thomas Sosa
Mr. Thomas C. Sosa Jr.
2374326
Polonsky Unit
3872 FM 350 South
Livingston, Texas 77351

Mr. Thomas C. Sosa Jr.

2374326

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Clark

U.S. District Court

1100 Commerce Bldg. # 1452

Dallas, Texas 75242-1495

